1 Geoffrey M. Drake, *pro hac vice*
   TaCara D. Harris, *pro hac vice*
2 KING & SPALDING LLP
   1180 Peachtree Street, NE, Suite 1600
3 Atlanta, GA 30309-3521
   Telephone: (404) 572-4600
4 Facsimile: (404) 572-5100
   Email: gdrake@kslaw.com
5   tharris@kslaw.com

6 *Attorneys for Defendants TikTok Inc., TikTok*
   LLC, TikTok Ltd., ByteDance Inc., and
7 *ByteDance Ltd.*

8
                IN THE UNITED STATES DISTRICT COURT
9
              FOR THE NORTHERN DISTRICT OF CALIFORNIA
10
                         OAKLAND DIVISION
11

12 IN RE SOCIAL MEDIA ADOLESCENT   MDL No. 3047
    ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION   Case No. 4:22-md-03047-YGR

14 THIS FILING RELATES TO: Honorable Yvonne Gonzalez Rogers

15 ALL ACTIONS
                                            DECLARATION OF GEOFFREY M.
16   **DRAKE IN SUPPORT OF TIKTOK**
                                            DEFENDANTS' ADMINISTRATIVE
17   **MOTION TO CONSIDER WHETHER**
                                            CASES SHOULD BE RELATED
18

19

20

21

22

23

24

25

26

27

28

1

DECLARATION OF GEOFFREY M. DRAKE

2   I, Geoffrey M. Drake, declare as follows:

3   1.   I am an attorney admitted to practice in this District and a partner at King &

4 Spalding LLP, counsel of record for Defendants TikTok Inc., TikTok LLC, TikTok Ltd.,

5 ByteDance Inc., and ByteDance Ltd. ("TikTok Defendants"). I submit this Declaration in support

6 of Defendants' Administrative Motion to Consider Whether Cases Should Be Related (the

7 "Motion"). Unless otherwise indicated, I have personal knowledge of the facts set forth in this

8 declaration and, if sworn, I could and would competently testify to them.

9   2.   On November 13, 2024, TikTok Defendants emailed Plaintiff's counsel in (the

10 "California Attorney General Action) and the Plaintiffs' liaison counsel in the above-captioned

11 case pursuant to Civil Local Rules 7-11 and 7-12(a) to determine whether they would stipulate to

12 the Motion. The email (i) stated TikTok Defendants planned to file an administrative motion

13 seeking to relate the California Attorney General Action to the above captioned multi-district

14 litigation, (ii) stated the bases for relation (*e.g.*, overlapping legal and factual issues), and (iii)

15 requested Plaintiffs' position.

16   3.   Plaintiff's counsel in the California Attorney General Action responded on

17 November 14, 2024 and declined to stipulate to this motion. The MDL Plaintiffs took no position

18 on this Motion. Attached as Exhibit B is a true and correct copy of the above referenced emails.

19   I declare under penalty of perjury that the foregoing is true and correct, and that this

20 Declaration is executed this 14th day of November, 2024 at Los Angeles, California.

21

22   */s/ Geoffrey M. Drake*

23

24

25

26

27

28

GEOFFREY M. DRAKE DECL. ISO TIKTOK DEFENDANTS'
ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED
CASE NO. 4:22-MD-03047-YGR

2